

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

KESHA T. WILLIAMS,	:	
	:	
Plaintiffs,	:	
v.	:	Case No.: 1:20-cv-01397-CMH-TCB
	:	
STACEY A. KINCAID, <i>et al.</i> ,	:	
	:	
Defendants.	:	

MEMORANDUM IN SUPPORT OF
MOTION FOR ENTRY OF PROTECTIVE ORDER

Defendant, Stacey A. Kincaid, hereby submits this Memorandum of Law in Support of her Motion for Entry of Protective Order pursuant to Fed. R. Civ. P. 26(c) to permit discovery and trial preparation to proceed with a minimum of discovery motions over matters of confidentiality. This Order will assist the parties in timely and productively conducting discovery as well as safeguard information and identities. A proposed Stipulated Protective Order which the parties have agreed to is attached hereto as "Exhibit A."

For these reasons, Defendant respectfully requests this Court to enter the attached Stipulated Protective Order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the foregoing Memorandum in Support of Motion for Entry of a Protective Order via ECF this 7th day of January 2021 to:

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